

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

~~Representing Plaintiff & Plaintiff at trial~~

Plaintiff Khalif Abdullah

Write the full name of each plaintiff.

No. _____
(To be filled out by Clerk's Office)

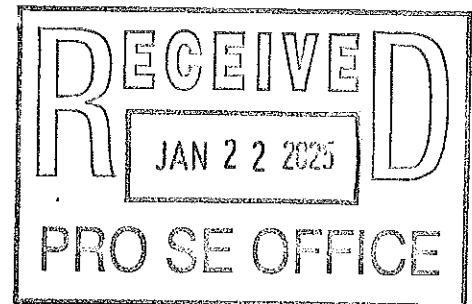
-against-

~~Good for defendant~~ Department of
Corrections, T. Wilcox, Sgt. S. Leon

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.

COMPLAINT
(Prisoner)

Do you want a jury trial?
 Yes No



NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

Violation of my federal constitutional rights

Other: _____

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

Khalf

First Name

TARIQ

Middle Initial

Abdullah

Last Name

N/A

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

349-240-1626

Rikers Island

ATF96A 14A2966

Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

Rikers Island

Current Place of Detention

1600 Hazen St

Institutional Address

East Elmhurst

County, City

Ny

State

11370

Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

- Pretrial detainee
- Civilly committed detainee
- Immigration detainee
- Convicted and sentenced prisoner
- Other: _____

IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1:	<u>Department of Correction</u>	First Name	Last Name	Shield #	
	<u>Employer</u>			Current Job Title (or other identifying information)	
	<u>1220 Washington</u>			Current Work Address	
	<u>Albany</u>			County, City	
	<u>Ny</u>			State	
	<u>12220</u>			Zip Code	
Defendant 2:	<u>Sgt S.</u>	First Name	<u>Leon</u>	Last Name	Shield #
	<u>Sergeant</u>			Current Job Title (or other identifying information)	
	<u>Attica Correctional facility</u>			Current Work Address	
	<u>Attica</u>			County, City	
	<u>Ny</u>			State	
	<u>10064</u>			Zip Code	
Defendant 3:	<u>Superintendent J. wilcox</u>	First Name	<u>J. wilcox</u>	Last Name	Shield #
	<u>Sup. Intendent at Attica Correctional facility</u>			Current Job Title (or other identifying information)	
	<u>Attica Correctional facility</u>			Current Work Address	
	<u>Attica</u>			County, City	
	<u>Ny</u>			State	
	<u>10064</u>			Zip Code	
Defendant 4:	First Name	Last Name	Shield #		
				Current Job Title (or other identifying information)	
				Current Work Address	
				County, City	
				State	
				Zip Code	

V. STATEMENT OF CLAIM

Place(s) of occurrence: ATTICA Correctional facilityDate(s) of occurrence: July 24, 2023

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

doing 11 Years
While i was in Attica Correctional facility I wrote J wilcox
The Super intendant AT The Time A letter containing Personal information
Requesting to move off my Block (D) so that i may go home in peace
which was set for Sep - 28 - 2023. I had "no" Enemies nor
did i ever state in The letter that i had Enemies. The Sup int
Sent The letter to Sgt S leon who ^{was} then become mad at me for mistakenly
Pronouncen her name "leona" in a letter written to The facility
Prior Requesting to move on July 24 At 11:00 o'clock while i was
using The Kiosk, i seen Sgt leon walking with A member of The "bloods" into
her office with my letter (I saw my hand written). upon exiting The
Room She look Directly at me and said " hes Snitching Right"?
An The inmate said Yes. (All of this is well documented on "camera")
In Grrrevances, letters to OSi, fBI, The Commissioner, The Governor
Albany (1220 washington), P.C Reports, special investigation unit, and
Many OTHER Agencies i wrote while in ATTICA. After That i had A
Bunch of Enemies, I was LABELED A RAT ~ made A Blood "bit"
And was marked for death Inside Prison And outside Prison by gangs.
THE STATE Officer And Employees you encounter have The Same DUTY not to
harm you And your Property That other Citizen have, and because
They Are State ACTORS They also have A Duty not to Violate your

federal and Constitutional Rights. The Defendant^s used cruel and unusual punishment to abuse me and violated my constitutional protections. After being labeled A "Rat" in place on multiple Gang "Hit List" by gang hierarchy 2 attempts, 2 separate time was made on my life at Attica forces me to sign into P.C. Two times just so I would not catch a ticket (by fighter) in Reviving my chances to go home. I was so "humiliated" the whole jail was trying to kill me and the torture continue on the P.C. Block as bullies would constantly "yell" Rat, Snitch, ~~Snitch~~ while on 24 lockdown in the protective unit.

INJURIES: Continued on (f)(2) -----

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I was diagnosed with PTSD where I have to take buspirone, clonidine, paroxetine, (Mental Anguish), "Defamation" - I was labeled A "Snitch" ~~Snitch~~ and A Rat because of the defendant's action, "Incarceration" because of the defendant action - I was "bullied" leading to a Alleged incident with a gang member causing my arrest. because of defendant's action I am being jump "Now" in every gang house ~~I've been in on Riker Island~~, I've been stabbed in the head leaving a 1cm laceration to the head needing recommended staples and stitches. I received damage to my VI. RELIEF Eye needing stronger glasses.

State briefly what money damages or other relief you want the court to order.

225
I want the relief of ~~200~~ million\$ paid in full by defendant's
I want Sgt Leon "fired" for her role in damaging my life
I want Superintendant Jo Wilcox fired for her role in damaging my life and the Department of Correction thoroughly investigated for allowing staff malfeasance against residence during their watch (Attica)

Continued pg 2

Continued . . .

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This was also placed on the record as i constantly wrote grievances, state agents, The FBI, OSI, SIV, Albany, The Commissioner, The governor, The Sup int and many other agencies i wrote while at Attica. Sep 28th 2023 i was released on parole from Attica Correctional facility. Once i was out i thought the danger was "over" but i was release into the NYC Department of homeless Services. And once there i would be met with brutal torture and harassment from the minions of the old gang hierarchy in counter Upstate (at Attica). Due to the defendant's actions i accumulated these enemies which put me at a higher risk of reoffending. I tried to ignore it because i knew i was on parole ~~as~~ a "violent felon" but the suffering mental anguish i counterd while in these ~~shelters~~ shelters was so overwhelming i just wanted to commit suicide. Because of the defendant actions i was bullied, haze, called a Rat, ~~scum~~, i had no friend and was always under the scope of my "enemies" it was torture and many day^{happening} i felt like exploding while this was ~~taken place~~ me i made sure i stayed programming, gaining certification in trades, working in internships

and Complying with Paroll so much that i was set to be Realeased in 2 1/2 years
ON A 5 year Supervision. I was now and then Reformed And Working towards building my life.
I obtained my subsidy voucher and was looking for housing To move out of The shelter,
I Got my permitt to Drive And was working towards obtaining my ~~Gold~~ - i also was
Attending work Help for Programming And ^{was} Soon To be Employed as a Certified Constodial
Maintenance technician, BUT every night i would Return back to The shelter And would be
met with the most furrovious bullying And harrassment that it began to overwhelm me
"mentally". I moved to "4" Shelters during my 7 month's free. The last shelter i was in
was Wards island, This shelter was no diffrent Then Africa. I was harrassed
mentally ~~tortured~~ Tortured And abused, I was called a "Snitch", A ^{Rat} ~~Rat~~, my bed space
was violated. I was threatend with "Violence" I notified staff, Particulary
my Counselor Ms Cruz - i told her The gang's Hide in numbers so its hard to pin point them.
She told me They could not move me until something physically happens to me.
Since i could not just pack my stuff And "leave" (Cause i was on Paroll) I was
JUST "Stuck" To Endure the Tortur And bullying.

I became overwhelmed emotionally which lead to a "Alleged" Altercation with a gang member for that "Attempted murder" member 4-25-2024, upon my arrest I was placed in a cell for countless hours, I was then placed on Rikers Island where I am being abuse ~~abuse~~ verbally harassed, "isolated" and bullied in every gang house in NY. I was jumped numerous times by Gang members, stabbed in my head and loss some of my sight in the "Right Eye" which I now need "Stranger" Glasses, I spent 9 months incarcerated up until this date 1/10/25

And I am requesting 225 million \$ in damages that stemmed from the defendant's violation of my Constitution Right ~~to life~~

On ~~July 10, 2024~~ I wrote Sup int a letter requesting to move blocks and acting in concert with the Sgt ^{she} took the letter and attempted to get me killed.

~~on July 10, 2024~~ Sgt Leon took a letter and show it to gang members got me "PUT out there" on "hit list" - Labled a Rat ^{IN A} attempt to get me killed by gang members and its all on "Record" (including camera)

This was cruel and unusual punishment inflicted and a violation of my Constitutional Rights - "The state employees violated their duty not to harm me" ~~to life~~

The Department of Correction are responsible for hiring these "dirty employees" making them responsible as well. Brutal tactics are being use by state employee to abuse us as witness by the murder ^{place} taken on camera in mercy C.F. my claim is true and can be proven!

Khalif As-Sabir

VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Jun 10 2025

Dated

Khalif Abdullah

Plaintiff's Signature

Khalif

First Name

Tariq

Middle Initial

Abdullah

Last Name

1600 hazen st

Prison Address

East Elmhurst

County, City

NY

State

11370

Zip Code

Date on which I am delivering this complaint to prison authorities for mailing:

4/11/25

Khalil Khouli
349 240 126
1600 Haile St
East Elm

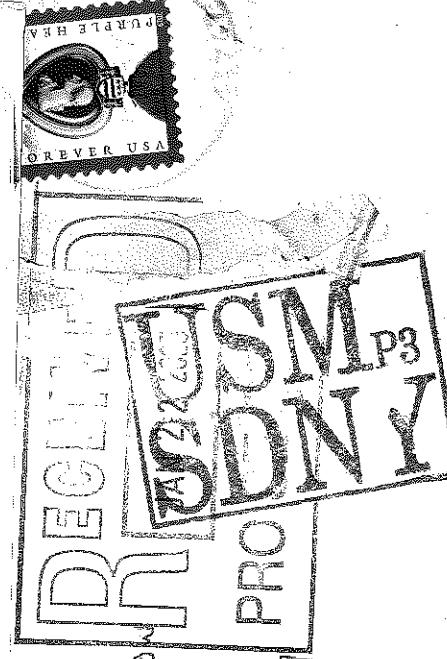
FCM LETTER
ASTORIA, NY 11103
JAN 15, 2025



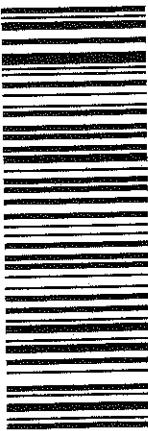
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